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1 2 3 4 5 6 7 8	SEYFARTH SHAW LLP Jay W. Connolly (State Bar No. 114725) jconnolly Giovanna A. Ferrari (State Bar No. 229871) gferra 560 Mission Street, Suite 3100 San Francisco, California 94105-2930 Telephone: (415) 397-2823 Facsimile: (415) 397-8549 Email: gferrari@seyfarth.com Attorneys for Defendant KINDERCARE LEARNING CENTERS, INC.	ari@seyfarth.com
	NORTHERN DISTRICT OF CALIFORNIA	
10 11 12 13 14 15 16 17 18 19	THERESA BUCKMAN–FALDUTI, an individual; TODD FALDUTI, and individual, plaintiffs, such that it is a Delaware corporation, person before the property of the pr	Case No. C 08-04778 CW STIPULATION AND ORDER TO EXTEND THE TIME FOR (1) MOTION FOR SUMMARY JUDGMENT HEARING; (2) DEADLINES ASSOCIATED WITH MOTION FOR SUMMARY JUDGMENT HEARING; (3) FACT AND EXPERT DISCOVERY DEADLINES; AND (4) CASE MANAGEMENT CONFERENCE AS MODIFIED
20	Pursuant to Local Rules 6-2 and 7-12, Defe	endant KINDERCARE LEARNING
21	CENTERS, INC. ("KinderCare") and Plaintiffs THERESA BUCKMAN-FALDUTI and TODD	
22	FALDUTI (collectively, the "Parties") stipulate to extend the time for the motion for summary	
23	judgment hearing, the completion of fact and expert discovery deadlines, and the case	
24	management conference in this matter from Thursday, December 17, 2009 to Thursday, January	
25	14, 2010 for the reasons stated in the Declaration of Giovanna A. Ferrari attached hereto as	
26	Exhibit A. The parties further stipulate to extend all deadlines related to the motion for	
27	summary judgment hearing in accordance with a J	anuary 14, 2010 hearing date. The parties
28	STEEDLE ATTION AND INDODOSED OF DEPT TO EXTEND THE T	
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STIPULATION AND [PROPOSED] ORDER TO EXTEND THE TIME FOR MOTION FOR SUMMARY JUDGMENT HEARING, BRIEFING DEADLINES ASSOCIATED WITH MOTION FOR SUMMARY JUDGMENT HEARING, FACT AND EXPERT DISCOVERY DEADLINES, AND CASE MANAGEMENT CONFERENCE / CASE NO. C 08-04778 CW

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	1	
1	also stipulate to extend the deadline for the ex	xchange of expert disclosures and reports pursuant
2	to Federal Rule of Civil Procedure 26 from F	riday, November 6, 2009 to Friday, November 13,
3	2009.	
4	IT IS SO STIPULATED.	
5	DATED: November 5, 2009	SEYFARTH SHAW LLP
6		By: /s/ Giovanna A. Ferrari
7		Jay W. Connolly Giovanna A. Ferrari
8		Attorneys for Defendant KINDERCARE LEARNING CENTERS, INC.
9	DATED: November 5, 2009	ESTEY &BOMBERGER, LLP
10	SF1 28374759.1	By /s/ Stephen Estey
11		Stephen Estey Michael Bomberger
12		Attorneys for Plaintiffs THERESA BUCKMAN-FALDUTI AND
13		TODD FALDUTI
	DUDGITANT TO CTIDITI ATION IT IS SO	ORDERED, EXCEPT THE MOTION WILL BE
14	DECIDED ON THE PAPERS. THE CAS	E MANAGEMENT CONFERENCE IS
14 15	DECIDED ON THE PAPERS. THE CAST CONTINUED TO 4/13/10 AT 2:00 P.M.	E MANAGEMENT CONFERENCE IS
	DECIDED ON THE PAPERS. THE CAS	E MANAGÉMENT CONFERENCE IS
15	DECIDED ON THE PAPERS. THE CAST CONTINUED TO 4/13/10 AT 2:00 P.M.	E MANAGEMENT CONFERENCE IS
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